## Exhibit 1

## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE : No. 2:12-md-02323-AB

PLAYERS' CONCUSSION INJURY

LITIGATION : MDL No. 2323

: Hon. Anita B. Brody

THIS DOCUMENT RELATES TO:

:

ALL ACTIONS

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## **DECLARATION OF ORRAN L. BROWN, SR.**

I, ORRAN L. BROWN, SR., hereby declare and state as follows:

- 1. My name is Orran L. Brown, Sr. I am the Chairman and a founding partner of BrownGreer PLC ("BrownGreer"), located at 250 Rocketts Way, Richmond, Virginia 23231. BrownGreer is the Claims Administrator under the Class Action Settlement Agreement in this action.
- 2. I am over the age of 21. The matters set forth in this Declaration are based upon my personal knowledge and information.
- 3. I submit this Declaration to describe an Opt Out revocation request that we received recently.
- 4. In its April 22, 2015 Final Approval Order and Judgment, the Court directed the Claims Administrator to post a list of Opt Outs as of that date. Accordingly, we posted on the official Settlement website a list of the Opt Outs that were timely and included all the elements required for a valid Opt Out under Section 14.2(a) of the Settlement Agreement (175 names at the time) and a list of the Opt Outs that were untimely and/or were missing one or more of Section 14.2(a)'s required elements (33 names at the time).
- 5. Section 14.2(c) of the Settlement Agreement provides that a Class Member who had opted out but wished to revoke that Opt Out could submit a written request to do so

"[p]rior to the Final Approval Date." At various times after the April 22, 2015 Final Approval Date, 13 persons who had opted out submitted requests to revoke their Opt Outs. The Parties to the Settlement Agreement agreed to accept those revocation requests, subject to Court approval, and reported the revocation requests to the Court. By Orders of July 15, 2015 (Document 6642), December 22, 2015 (Document 6713), January 26, 2016 (Document 6739), September 15, 2016 (Document 6907), October 25, 2016 (Document 6924), and November 8, 2016 (Document 6937), the Court approved all the revocations. As a result, we no longer counted those persons as Opt Outs and posted on the Settlement website a revised list of the Timely Opt Out Requests Containing All Information Required by Section 14.2(a) or Otherwise Approved by the Court (the "Timely Opt Out List"), to reflect the results in the Orders. That Timely Opt Out List now contains 167 names, including the five persons whose Opt Outs the Court directed be added to that list in its Order of September 8, 2016 (Document 6902).

- 6. On December 7, 2016, we received a letter from Mr. Roy Lee Jefferson, Jr., asking to revoke his Opt Out. Mr. Jefferson is on the Timely Opt Out List. I have attached to this Declaration a copy of his letter, after redacting his personal identifying information. The Parties to the Settlement Agreement have agreed to accept his revocation request, subject to Court approval. If the Court grants its approval, we no longer will count Mr. Jefferson as an Opt Out and, upon direction of the Court, will post on the Settlement website a revised Timely Opt Out List.
- I, Orran L. Brown, Sr., declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed on this 7th day of December, 2016.

Orran L. Brown, Sr.

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Roy Jefferson

**Arnold Levin-NFL Concussion Settlement** 

Phone 877-882-1011

Dear Arnold Levin:

Please be advised I Roy Jefferson, want to revoke my request to be excluded from the NFL Concussion Settlement Class Action suit NO. 2:12-md-02323;. I want to be included in the NFL Concussion settlement. This request is for consideration. Thank you.

Roy Lee Jefferson Jr

D.O.B.

Phone:

Previous address:

Roy Lee Jefferson Jr\_\_\_\_ December 2, 2016